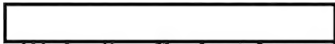


OGC Has Reviewed

24 FEB 1978

MEMORANDUM FOR: Chief, Plans and Programs Staff, OL

FROM:

  
Chief, Printing & Photography Division, OL

SUBJECT: Comments on Proposed S.2525

1. The wording in S.2525 pertaining to printing and binding is almost identical to that in Sec.8. of PL 110. I don't see anything in S.2525 resembling the preface to Sec.8, viz, "notwithstanding any other provisions of law...", nor do I know the impact of it's presence or absence. All pertinent references in S.2525 to activities of concern to this division are in Sec. 422.(a) (lines 23, 24, 25 on page 192 and lines 4,5 on page 193).

2. The basis upon which this division has operated printing and binding facilities are tied to a number of things specified in my memo to the D/L of 1 Nov 1977 regarding Title 44 USC. We read Sec. 8 as total exemption from Title 44. Then there were other agreements and precedence upon which we have been operating. Of course, OGC, as outlined in their memo to D/L of 11 January 1978, renders the opinion that "the Agency does not have blanket exemption from the provisions of Title 44." We are busy now drafting correspondence to the Joint Committee on Printing for waivers from specific provisions of Title 44.

3. What is the intent of Sec. 422 in S.2525? In my mind I interpret it just the same as Sec.8, but then OGC doesn't agree. If we are subject to Title 44, why is it in Sec. 422? The whole point of S.2525 is to tell us what and what not to do. We end up not with answers but questions.



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